

1 KAREN P. HEWITT
 United States Attorney
 2 RAVEN M. NORRIS
 Assistant U.S. Attorney
 3 California State Bar No. 232868
 United States Attorney's Office
 4 880 Front Street, Room 6293
 San Diego, California 92101-8893
 5 Telephone: (619) 557-7157
 Facsimile: (619) 557-5004
 6
 Attorneys for the Petitioner
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8 UNITED STATES DISTRICT COURT
 9 SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,)	Case No. 08cv 0502-IEG (CAB)
)	
11 Petitioner,)	JOINT MOTION FOR EXTENSION OF TIME
)	FOR RESPONDENT'S COMPLIANCE WITH
12 v.)	THIS COURT'S MAY 28, 2008 ORDER
)	
13 SEBASTIAN JUAREZ,)	[Fed. R. Civ. P. 6(b)(1)]
)	
14 Respondent.)	
_____)	

15
 16 COME NOW THE PARTIES, Petitioner United States of America by and through counsel,
 17 Karen P. Hewitt, United States Attorney, and Raven M. Norris, Assistant United States Attorney, and
 18 Respondent Sebastian Juarez, by and through counsel, Chris Rusch, and hereby jointly move the Court
 19 to extend the June 30, 2008 deadline for Respondent's compliance with this Court's Order Granting
 20 Petitioner to Enforce IRS Summons issued on May 28, 2008. The Court order directed Respondent to
 21 appear before IRS Revenue Agent Steve Silverman or designee, on June 30, 2008, at 9:00 a.m., at the
 22 offices of the Internal Revenue Service located at 880 Front Street, Suite 3255, San Diego, California,
 23 and to produce the documents and give testimony as directed in the summonses. On June 30, 2008,
 24 Respondent notified Agent Silverman that he has had difficulty producing all required documentation
 25 and testimony by June 30, 2008 but indicated that he would be able to fully comply by July 30, 2008.
 26 In light of Respondent's good faith effort to comply with the IRS summons and this Court's Order, the
 27 parties agreed that additional time is necessary for Respondent to comply with this Court's Order and
 28 the IRS Summonses.

Accordingly, in order to pursue resolution of Petitioners' claims without the intervention of the Court, and without waiving Petitioners' right to pursue sanctions for contempt of court for failure to comply with this Court's Order, the parties jointly request an extension of time for thirty days. Based upon the foregoing, it is respectfully requested that the Court enter an order, under FED. R. CIV. P. 6(b)(1), re-setting the deadline for the Respondent to appear before Revenue Agent Steve Silverman or designee, to **July 30, 2008**, at 9:00 a.m., at the offices of the Internal Revenue Service located at 880 Front Street, Suite 3255, San Diego, California, and to produce the documents and give testimony as directed in the summonses.

Dated: July 2, 2008

Respectfully submitted,

KAREN P. HEWITT
United States Attorney

s/ Raven M. Norris
RAVEN M. NORRIS
Assistant U.S. Attorney
Attorneys for Petitioner
Email: Raven.Norris@usdoj.gov

Dated: July 2, 2008


CHRIS RUSCH
Attorney for Respondent

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures of the United States District Court for the Southern District of California, I certify that the content of this document is acceptable to counsel for the Respondent and that opposing counsel has signed the original of this document, and that I have a faxed copy of said signed original document on file.

DATED: July 2, 2008

KAREN P. HEWITT
United States Attorney

s/Raven M. Norris
Assistant U. S. Attorney
Attorney for Defendants

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 08CV0502 IEG(CAB)
)
Petitioner,) CERTIFICATE OF SERVICE
)
v.)
)
SEBASTIAN JUAREZ,)
)
Respondent.)
_____)

IT IS HEREBY CERTIFIED THAT:

I, Raven M. Norris, am a citizen of the United States and am at least eighteen years of age. My business address is 880 Front Street, Room 6293, San Diego, California 92101-8893.

I am not a party to the above-entitled action. I have caused service of the Joint Motion to Extend on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

none

I hereby certify that I have caused the foregoing to be mailed, by the United States Postal Service, to the following non-ECF participants on this case:

Chris Rusch
Attorney at Law
406 Ninth Avenue, Suite 304
San Diego, CA 92101

the last known address, at which place there is delivery service of mail from the United States Postal Service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 2, 2008

s/ Raven M. Norris
RAVEN M. NORRIS